

UNITED STATE DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TERESITA SANTIAGO, RAMON LORENZO and  
TERESITA SANTIAGO, as the Mother and Natural Guardian of 06 CIV 7108 (PKL)  
KAREN SANTIAGO DIAZ and HENRY LORENZO, infants,

Plaintiffs,

-vs-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARIA MERCEDES ROSARIO BRETON, FABIAN GARCIA and  
PAOLA GARCIA,

Plaintiffs,

06 CIV 7110 (PKL)

-vs-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ZIBO WANG,

Plaintiff,

06 CIV 11382 (PKL)

-vs-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KIRSTEN ANDERSON,

Plaintiff,

06 CIV 13371 (PKL)

-vs-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LAURE BOUDET,

Plaintiff,

07 CIV 3098 (PKL)

-vs-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BETTY DORCE EXUME, as ADMINISTRATRIS OF THE  
ESTATE OF ANTONIDE DORCE, deceased, and  
BETTY DORCE EXUME, Individually, JACQUELINE BERTRAND,  
and MARIE LILIANE MILARD,

Plaintiffs,

07 CIV 3289 (PKL)

-VS-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-VS-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHRISTIAN YOPA and ABI-SARA MACHOLD,

Plaintiffs,

07 CIV 6889 (PKL)

-VS-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-VS-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SHERRY ANN GEORGE, SHERRY ANN GEORGE, as Mother  
and Natural Guardian of VOSHONA GEORGE, Infant, and  
SHERRY ANN GEORGE and ALLISON IDOHOU, as  
Co-Administrators of the ESTATE OF DORREN GREEN, Deceased,

Plaintiff,

-vs-

07 CIV 8364 (PKL)

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHEIKH SIDY MOHAMED TAMBADOU and  
OURY CISSE, Individually and as Co-Liquidators of the Estate of  
SOULEYMANE TAMBADOU, deceased,

Plaintiff,

07 CIV 9299 (PKL)

-vs-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC.,

Third-Party Defendant.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MAMDOU DAIDOU BAH and GNALEN BAH,

Plaintiffs,

08 CV 2440 (PLK)

-vs-

GREYHOUND LINES, INC., and THE GOODYEAR RUBBER  
and TIRE COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC., and UGL UNICCO  
f/k/a UNICCO Service Company,

Third-Party Defendants.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CINDYLYN LAMARCHE,

Plaintiff,

08 CV 2438 (PKL)

-vs-

GREYHOUND LINES, INC.,

Defendant.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC., and UGL UNICCO  
f/k/a UNICCO Service Company, and THE GOODYEAR TIRE  
& RUBBER COMPANY,

Third-Party Defendants.  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LIONEL CADELIS,

Plaintiff,

08 CV 2439 (PKL)

-vs-

GREYHOUND LINES, INC., and THE  
GOODYEAR TIRE & RUBBER COMPANY,

Defendants.

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GREYHOUND LINES, INC.,

Defendant/Third Party Plaintiff,

-vs-

MOTOR COACH INDUSTRIES, INC., and UGL UNICCO  
f/k/a UNICCO Service Company,

Third-Party Defendants.

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**PLAINTIFF LAURE BOUDET'S**  
**DISCLOSURE PURSUANT TO**  
**FED. R. CIV. P. 26**

Plaintiff, LAURE BOUDET, submits the following disclosure pursuant to *Fed. R. Civ. P. 26*.

**Rule 26(a)(1)(A)**

**Individuals likely to have discoverable information:**

Based upon information available, Plaintiff's counsel identifies the following individuals likely to have discoverable information relating to Defendant's defenses in this case:

- Laure Boudet;
- New York State Trooper Stannard;



- Unknown named New York State Troopers that investigated the accident
- Unknown named NTSB employees that investigated the accident
- Greyhound passenger Rosy Trandutrieu
- Greyhound passenger Lora Csillag
- Greyhound passenger Malary Ulna
- Greyhound passenger Lyonel Caselis
- Greyhound passenger Stephanie Souma
- Greyhound passenger Anne-Claude David
- Greyhound passenger Jorge Rivera
- Greyhound passenger Elisee Lombo Kaleba
- Greyhound passenger Karine Frigone
- Greyhound passenger Liliane Milaud
- Greyhound passenger Rochelle Wenick
- Greyhound passenger Marie Koide
- Greyhound passenger Christina Talledo
- Greyhound passenger Carolina Bages
- Greyhound passenger Sherry Ann Geioge
- Greyhound passenger Voshana Geioge
- Greyhound passenger Mamadou Bah
- Greyhound passenger Gnalen Bah
- Greyhound passenger Annika Thornton
- Greyhound passenger Sylvia Crazier
- Greyhound passenger Abi-Sara Machold

- Greyhound passenger Christian Yopa Feze
- Greyhound passenger John Schindler
- Greyhound passenger Paola Garcia
- Greyhound passenger Maria Garcia
- Greyhound passenger Zibo Wang
- Greyhound passenger Joseph Placid
- Greyhound passenger Josee Renaud
- Greyhound passenger Caroline Larouche
- Greyhound passenger Akiko Honda
- Greyhound passenger Guillaume Bedard
- Greyhound passenger Natalie Bouchard
- Greyhound passenger Daniel Eliosoff
- Greyhound passenger Daivd Regis Riond
- Greyhound passenger Marc-Oliver D'Amours
- Greyhound passenger Jessica Lawson
- Greyhound passenger Robert Caplin
- Greyhound passenger Lorenzo Santiago
- Greyhound passenger Kareem Santiago
- Greyhound passenger Terista Santiago
- Greyhound passenger Steven Puntel
- Greyhound passenger Marie Tesano
- Greyhound passenger Berthony Tesano
- Greyhound passenger Kirsten Anderson

- Greyhound passenger Lauren Bickford-Bushey
- Greyhound passenger Cynthia Lamarshe
- Greyhound passenger Jacqueline Bertand
- Greyhound bus employees responsible for the maintenance and repairs of the bus

Plaintiff also anticipates identifying additional witnesses after the receipt of additional discovery. Plaintiff reserves the right to supplement this response as its discovery and investigation reveals additional persons who may have relevant knowledge.

**Rule 26(a)(1)(B)**

**Documents that may be used to support Plaintiff's claims (other than by impeachment):**

Plaintiff will produce the following documents:

- New York State Police Report;
- New York State Police Photographs;
- National Transportation Safety Board report (not available at present);
- Plaintiff Laure Boudet's medical records (attached hereto s Exhibit A); and
- Plaintiff's photographs (attached hereto as Exhibit B).

Plaintiff reserves the right to supplement this response as its discovery and investigation reveals additional documents that should be produced in accordance with *Fed. R. Civ. P. 26(a)(1)(B)*.

**Rule 26(a)(1)(C)**

**Damages claimed:**

Plaintiff will claim damages for serious permanent personal injuries, pain and suffering and out of pocket expenses that were incurred. Updated medical records will be provided at a later date.

Plaintiff will claim damages for living expenses while residing in Montreal for three months while receiving medical treatment.

Plaintiff will claim damages to personal belonging that were lost or damaged at the time of the accident.

Plaintiff will claim lost earnings and future earnings capacity.

**Rule 26(a)(1)(D)**

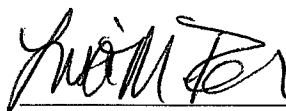
Not applicable.

**Disclosure of Experts**

Plaintiff has not yet retained any expert witnesses. Plaintiff will supplement this response when and if she retains an expert(s) in accordance with the Case Management Order.

Dated: Syracuse, New York  
September 9, 2008

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